

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10288-RWZ

UNITED STATES

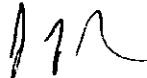
v.

JOSEPH ALLEN

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Joseph Allen, the defendant in the above-captioned criminal case, hereby moves this Court to modify his conditions of release by permitting him to attend Easter dinner with his family at the home of his girlfriend's grandmother, Rosalie Cavallarin. Ms. Cavallarin resides at 9 Angle St. in Gloucester. Mr. Allen requests to be off his electronic bracelet for this purpose between 11:00 a.m. and 5:00 p.m. on Easter Sunday, March 27, 2005..

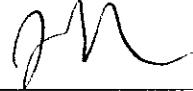
Respectfully submitted,
JOSEPH ALLEN
By his attorney,



James L. Sultan, BB0 #488400
Rankin & Sultan
1 Commercial Wharf North
Boston, MA 02110
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the government by faxing and mailing a copy thereof, to AUSA David Tobin, Moakley Federal Courthouse, One Courthouse Way, Suite #9200, Boston, MA 02210 and US Pretrial Services Officer Christopher Wylie, Moakley Federal Courthouse, One Courthouse Way, Suite #1300, Boston, MA 02210 on March 23, 2005.



James L. Sultan